



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 10, 2020

Application granted.

SO ORDERED.

7/10/2020

Via ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
New York, New York 10007

A handwritten signature of P. Kevin Castel in black ink, written over a horizontal line.

P. Kevin Castel
United States District Judge

Re: United States v. Geovanny Fuentes Ramirez, S6 15 Cr. 379 (PKC)

Dear Judge Castel:

With the consent of defense counsel, the Government respectfully requests until July 24, 2020 to respond to the defense's letter seeking certain records relating to the selection of the grand jury that returned the indictment in this case.

As the Court may be aware, similar requests are pending in numerous cases in this District. On June 30, 2020, in the case of *United States v. Balde*, 20 Cr. 281 (KPF), Judge Failla presided over a conference call with the Jury Administrator for the Southern District of New York, Linda Thomas. Counsel for the Government and defendants in that case and numerous other were invited to and did participate in the call.

During that call, Ms. Thomas provided additional information about the existence and form of documents responsive to the defendant's requests. Judge Failla has ordered the parties in *Balde* to meet and confer about whether there is any dispute as to which documents requested by the defense should be produced, and to submit a joint status letter no later than July 14, 2020. Because the document requests in this case are substantially similar to those in *Balde*, the Government believes that any agreement reached in that case is likely to moot much if not all of any dispute in this case.

Accordingly, with the defendant's consent, the Government requests that the Court grant the Government until July 24, 2020 to respond to the defendant's request, at which time the Government will notify the Court whether there is any dispute regarding the defendant's document requests.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
Amanda L. Houle / Matthew J. Laroche /
Jason A. Richman / Elinor L. Tarlow
Assistant United States Attorneys
(212) 637-2194 / 2420 / 2589 / 1036

Cc: Avraham C. Moskowitz, Esq. (by ECF)